

EXECUTIVE COMMITTEE

PRESIDENT

Cathy Gerali

District Manager
Metro Wastewater
Reclamation District
Denver, CO

VICE PRESIDENT

David St. Pierre

Executive Director
Metropolitan Water
Reclamation District of
Greater Chicago
Chicago, IL

TREASURER

Mark S. Sanchez

Executive Director
Albuquerque-Bernalillo
County Water
Utility Authority
Albuquerque, NM

SECRETARY

John P. Sullivan

Chief Engineer
Boston Water &
Sewer Commission
Boston, MA

PAST PRESIDENT

Raymond J. Marshall

Executive Director
Narragansett Bay
Commission
Providence, RI

CHIEF EXECUTIVE OFFICER

Adam Krantz

November 21, 2017

Jessica Bailey

Antimicrobials Division
Office of Pesticide Programs (OPP)
U.S. Environmental Protection Agency (U.S. EPA)
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001
Submitted via *www.regulations.gov*

**Re: Sodium, Calcium, and Potassium Hypochlorite Registration Review -
Proposed Interim Decision (EPA-HQ-OPP-2012-0004 and EPA-HQ-OPP-
2014-0157)**

Dear Ms. Bailey:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on EPA's Proposed Interim Decision for Sodium, Calcium, and Potassium Hypochlorite (82 *Fed. Reg.* 44405, September 22, 2017). NACWA represents the interests of nearly 300 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the U.S. Many NACWA members also provide stormwater services for their communities.

NACWA's comments relate only to products used in swimming pools, spas, and hot tubs. Swimming pools may be periodically drained to municipal separate storm sewer systems (MS4s), to sanitary sewers leading to publicly owned treatment works (POTWs), or to surrounding landscaped areas. MS4s and POTWs are not specifically designed to treat pesticides, and some antimicrobials could potentially interfere with the biological processes used to treat wastewater. Excessive drainage into sewers can also lead to sewer line backups. While MS4s and POTWs may have the ability to work with public and commercial swimming pool operators to control pool drainage practices, it is difficult for MS4s and POTWs to regulate the frequency, volume, and constituents of discharges from the millions of residential pools in the U.S.

Product labels for pesticides used in swimming pools, spas, and hot tubs can help prevent harmful impacts to receiving waters, sewer lines, and treatment plants since the label may be the only source of information seen by the end user of the product.

Existing labels for products containing sodium, calcium, and potassium hypochlorite do not include “Directions for Use” language regarding the draining of swimming pools, spas, and hot tubs. NACWA fully supports the following language proposed by EPA for all products used in pools, spas, and hot tubs, instructing the user to find out and follow the appropriate procedures for their locality:

“Before draining a treated pool, spa, or hot tub, contact your local sanitary sewer and storm drain authorities and follow their discharge instructions. Do not discharge treated pool or spa water to any location that flows to a gutter, storm drain, or natural water body unless discharge is allowed by state and local authorities.”

NACWA also supports EPA’s clarification that the Office of Pesticide Programs’ standard NPDES permit label language is only for products used in manufacturing, and is not suitable for end use products.

Thank you for your consideration of these comments. Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia A. Finley".

Cynthia A. Finley, Ph.D.
Director, Regulatory Affairs